

Permitting EVR Phase II Systems

A view from the field

Before “Square One”

- Some clients/consultants do not stop to consider how many and what kind of permits are needed
- Some clients/consultants believe the mandate implies that no permit is needed beyond, perhaps, an ATC from the local air district
- Some agencies have not decided how to permit the project (inconsistent responses to inquiries)

The Complicated Nature of the Beast: (Components of the Project)

- 1. EVR Phase II Equipment Installation
 - A. Healy Clean Air Separator
 - B. VST Vapor Processor
- 2. In Station Diagnostic System (ISD)
 - A. equipment
 - B. monitoring system upgrade
- 3. The particular site configuration

“Square One”

- 1. Contacting the Permitting Agencies
- 2. Explaining the Mandate
- 3. Describing the Equipment
- 4. Finding the Competent Authority

The Placement of the EVR Phase II Equipment

- 1. Manufacturer's specifications
- 2. Setback requirements of the Fire Code for "vapor processors"
- 3. Local building setback requirements
- 4. What if there is "no place to put it"? Is there any room for compromise?

Aesthetic Considerations

- 1. Painting the tank
- 2. Screening, fencing, and/or landscaping
- 3. The demands of fire safety
- 4. What can be presumed?

ISD: to permit or not to permit

- 1. Pressure Sensor and Flow meters may be installed according to different configurations: does this impact the UST system?
- 2. Is the site configured to receive the equipment or is digging involved?
- 3. The software upgrade: what is the impact on the monitoring system?

Submittal Requirements

- 1. Being clear, concise, complete and consistent
- 2. Requiring what is absolutely necessary (forms, documents, signatures, documents, copies)
- 3. Fees

Processing and Sequencing

- 1. Processing the volume of applications (number of staff and streamlined procedure)
- 2. Who has the last word in approvals and sign-offs? (avoiding "turf wars")
- 3. Time, Money, and Deadlines

The “Last Square”

- In view of this project’s scope and complexity, what can we do together to facilitate the “permit phase” so that as many GDFs as possible can comply with the CARB mandate?